

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

June 8, 2000

Allocations Branch  
Room 3 A320  
C/o Office of the Secretary  
TW B204, FCC  
445 12<sup>th</sup> Street NW  
Washington, DC 20554

Dear Secretary:

I am requesting that the Commission amend Section 73.202 (b) of the Rules and Regulations for the following:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Pilot Rock, OR	None	221C3

Pilot Rock, Oregon has a population of 1,478 according to the 1990 Census report data. The city is located in Umatilla County. This proposal will be the first FM allotment to Pilot Rock. The attached engineering study shows that Channel 221C3 can be allotted to Pilot Rock with a transmitter site restriction of approximately 17km to the west. Figure 1 of the Engineering Report shows an area to locate a site that meets the spacing requirements of section 73.207 of the Rules and Regulations.

It would be in the public interest to assign Channel 221C3 to Pilot Rock, Oregon as its first FM allotment. In the event that the FCC makes this proposed FM assignment, I, Aaron Bruton will apply for the facility.

Copies of comments should be addressed to:

Aaron Bruton  
1832 Fern  
Walla Walla, WA 99362

Thank you for your consideration in this matter.



Aaron Bruton

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June 8, 2000

## DECLARATION

### Engineering Statement

Jeffery A. Bruton is an engineer for Bruton Broadcast Engineering. Located at 1832 Fern in Walla Walla, Washington. The Engineering Statement was prepared by the petitioner for the Rule Making to amend the Table of FM assignments, Section 73.202 (b), to allocate Channel 221C3 to Pilot Rock, Oregon. It is proposed to amend the Table of FM Assignments as Follows:

<u>Community</u>	<u>Present Allocation</u>	<u>Proposed Allocation</u>
Pilot Rock, Oregon	NONE	221C3

A channel study was made to determine whether a channel could be found which would comply with the Commission's minimum separation requirements of Section 73.207 of the Rules and Regulations. This study showed that Channel 221C3 would meet these separation requirements. The reference coordinates relied upon are as follows:

North Latitude: 45° 26' 18"  
West Longitude: 119° 02' 13"

Table 1 is a list of existing stations, applications, allocations and proposed rule makings of co-channel and adjacent channel assignments pertinent to the allocation of Channel 221C3 to Pilot Rock, Oregon. The tabulation of distances shown in this Table were calculated by the methods prescribed in Section 73.208 of the Commission's Rules and Regulations, using the above reference point.

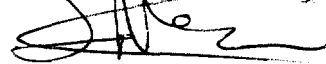
Section 73.315(a) of the FCC Rules and Regulations requires that the 70 dBu contour must encompass the boundaries of the principal community to be served. There is no terrain obstruction to the city of Pilot Rock, Oregon. Therefore, the proposed operation will provide the requisite coverage to Pilot Rock, Oregon in accordance with the provisions of Section 73.315(a)&(b) of the FCC Rules and Regulations.

Figure 1 is a map which shows the community of license, the reference site and surrounding terrain features.

The results of these studies show that Channel 221C3 can be assigned to Pilot Rock, Oregon consistent with the requirements of the Commission's Rules and Regulations.

I declare under penalty of perjury that the foregoing is true and correct.

Bruton Broadcast Engineering



Jeffery A. Bruton  
RF Engineer Consultant  
June 8, 2000

TABLE I

Bruton Broadcast Engineering  
1832 Fern Walla Walla, WA 99362

SEPERATION STUDY

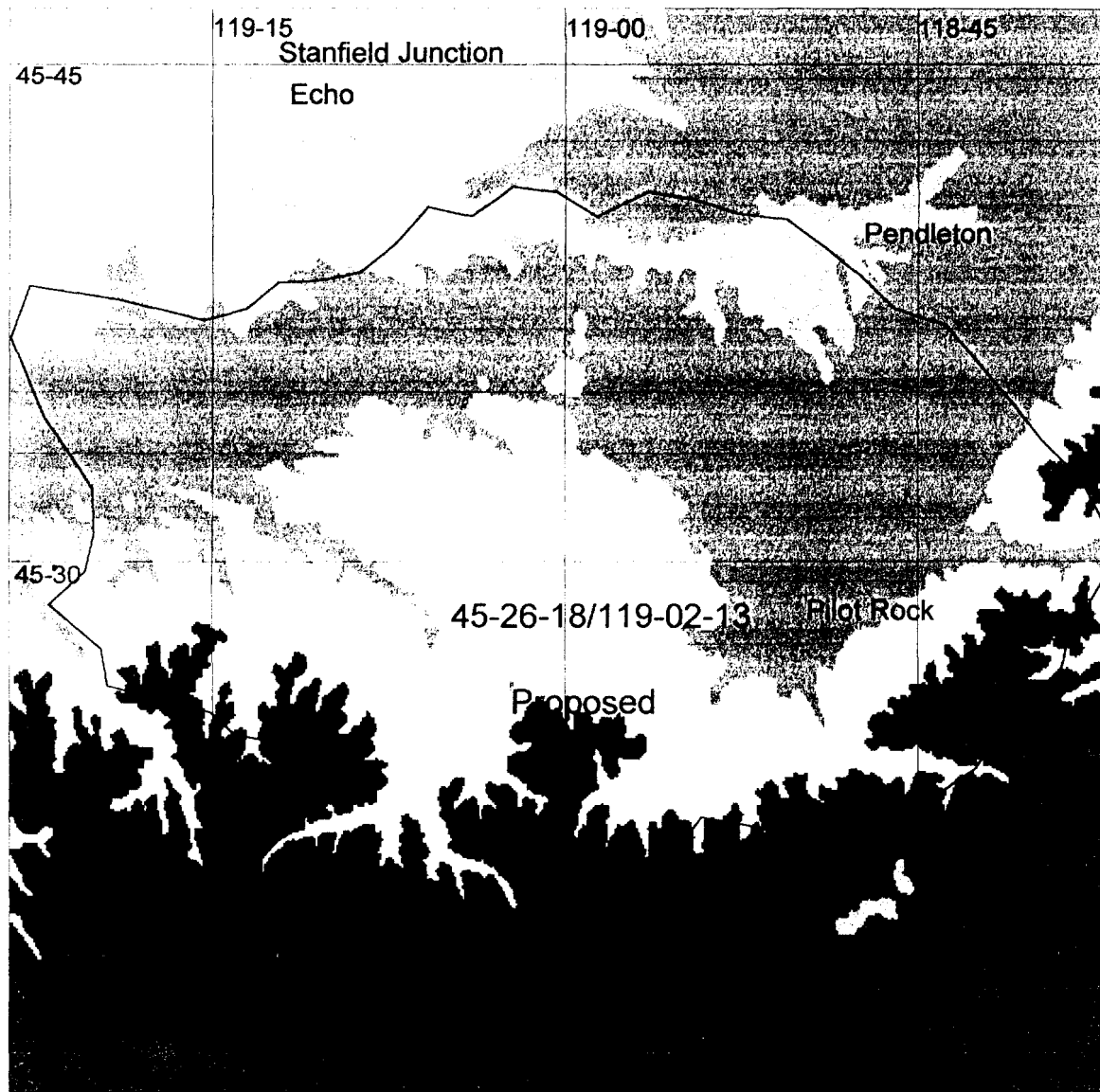
Pilot Rock, OR

Channel 221C3 45-26-18 / 119-02-13 ERP: 25 kW EAH: -53 m

CALL	ST CITY	FREQ	CHN	CL	ERP	STAT	DST:km	dBu
FORMAT	ARN	OWNER						
LATITUDE	LONGITUDE	HAAT:m	AMSL:m	BRNG	SEP:km	CLR:km		
KBLD	WA Kennewick	91.7	219	C3	1.8	Lic	72.3	60
Religious	BLED980102KA					Calvary Chapel of Tri-Ci		
46-04-58	119-09-39	296	640		172.4		43.0	29.3
KDNA	WA Yakima	91.9	220	C1	18.5	Lic	166.9	60
Spanish	BMLED810416AC					Northwest Chicano Radio		
46-31-42	120-31-03	280	641		136.6		144.0	22.9
KEOL	OR La Grande	91.7	219	A	0.3	Lic	75.3	60
Album Progressi	BLED850201LO					State Board of Higher Ed		
45-19-16	118-05-26	-227	878		280.0		42.0	33.3
KGNR	OR John Day	91.9	220	A	1.5	Lic	111.8	60
Religious	BLED930129KA					Life Broadcasting, Incor		
44-26-03	118-57-29	-32	1202		356.8		84.0	27.8
KWVRFM	OR Enterprise	92.1	221	A	3.0	Lic	142.9	60
Country	BLH870427KB					Wallowa Valley Radio Bro		
45-19-01	117-13-14	-190	1534		275.4		138.0	4.9
KZHR	WA Dayton	92.5	223	C1	54.0	Lic	90.8	60
Spanish	BLH920731KC					KMEX, Inc.		
45-59-19	118-10-28	379	1137		227.7		76.0	14.8

End of Study

# FIGURE 1 - Proposed Allotment Channel 221C3



Bruton Broadcast Engineering

Scale 1:397600

10 Km

FM City Grade	State Borders	Lat-Lon Grids
1798 - 1563 m	1563 - 1328 m	1328 - 1093 m
1093 - 858 m	858 - 623 m	623 - 388 m
388 - 153 m	< 153 m	